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LOS ANGELES COUNTY SHERIFF'S DEPARTMENT

7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 SIGITAS RAULINAITIS and RIMA
11 RAULINAITIS

12 Plaintiffs,

13 v.

14 THE LOS ANGELES COUNTY
SHERIFF'S DEPARTMENT

15 Defendant.
16

CASE NO. CV 11-8026 JHN(JCGx)

(to be related to CV 10-08377 JAK
(JEMx) and CV 11-06154 SJO(JCx))

**LASD REPLY TO PLAINTIFF'S
OPPOSITION TO RELATING
CASES**

[Local Rule 83-1.3]

17 Under Central District Local Rule 83.1.3, a case need not be pending for it to
18 be related. The Rule only requires that the related action be "previously filed or
19 currently pending in the Central District" and (a) arise from the same or closely
20 related transaction, happening, or event; (b) call for determination of the same or
21 substantially related or similar questions of law and fact; or (c) for other reasons
22 would entail substantial duplication of labor if heard by different judges." (Central
23 Dist. Local Rule 83.1.3.)

24 Here, the cases of *Jonathan Birdt v. Charlie Beck, et al.*, United States
25 District Court Case No. CV 10-08377 JAK (JEMx), *Robert Thomson v. Torrance*
26 *Police Department, et al.*, United States District Court Case No. CV 11-06154 SJO

27 HOA.855092.1
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Reply to Opp. to Notice of Related Cases
CV 10-08377 JAK(JEMx) /
CV 11-06154 SJO (JCx),
CV 11-08026 JHN(JCGx)

(JCx), and *Sigitas Raulinaitis, et al. v. Los Angeles County Sheriff's Department*, United States District Court Case No. CV 11-08026 JHN(JCGx) all allege that the Los Angeles County Sheriff's Department's policy for the issuance of concealed weapons permits violates the Second Amendment. In light of the identical legal issues presented in these cases, Defendant LASD submits that litigating these cases separately will create a substantial duplication of labor if heard by different judges. Judge Kronstadt recently ruled on the very issues that are the subjects of the *Thomson* and *Raulinaitis* cases, and is already familiar with the law and the facts. Having two other judges become familiar with the issues will result in a substantial and expensive duplication of labor. Moreover, inconsistent rulings may result. Accordingly, these are Related Cases for the purposes of Local Rule 83.1.3.

Additionally, while the parties have filed their respective motions for summary judgments, the matter has not been fully briefed. The hearing on the *Thomson* matter is presently set before Judge Otero on February 27, 2012. While Plaintiff has filed his Oppositions to the Defendants' summary judgment motions, Defendants have not yet filed their papers. There is no trial date on the *Thomson* case. The trial date in *Raulinaitis* is September 4, 2012.

DATED: January 20, 2012

Respectfully submitted,

ANDREA SHERIDAN ORDIN
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By /S/
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LOS ANGELES COUNTY SHERIFF'S
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